

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOSEPH HARRINGTON, individually and on
behalf of all others similarly situated,

Plaintiff,

V.

TETRAPHASE PHARMACEUTICALS INC.,
GUY MACDONALD, JOHN CRAIG
THOMPSON, and DAVID LUBNER,

Defendants.

DAN SCHLAPKOHL, individually and on behalf of
all others similarly situated,

Plaintiff,

V.

TETRAPHASE PHARMACEUTICALS INC.,
GUY MACDONALD, JOHN CRAIG
THOMPSON, and DAVID LUBNER,

Defendants.

JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER

WHEREAS, on January 26, 2016 and March 23, 2016, the above-captioned putative shareholder class actions (the “Actions”) were filed in this Court, asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5;

WHEREAS, on May 25, 2016, this Court approved the consolidation of the Actions, the appointment of Newvana Ventures Limited and Plymouth County Retirement System as lead plaintiffs (“Lead Plaintiffs”) and the appointment of the law firms Levi & Korsinsky LLP and Scott + Scott, Attorneys at Law, LLP as lead counsel [Dkt. 53];

WHEREAS, Lead Plaintiffs presently intend to file a consolidated amended complaint, and the parties have agreed that Defendants are not required to answer or otherwise respond to the original complaints filed in the Actions;

WHEREAS, Defendants presently intend to file a motion to dismiss the forthcoming consolidated amended complaint, and the parties agree that, by operation of the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 (the “PSLRA”), discovery should be stayed during the pendency of the motion to dismiss;

WHEREAS, as directed by the Court [Dkt. 53], the parties have conferred and agree to the following schedule the filing of a consolidated amended complaint and for briefing of Defendants’ anticipated motion to dismiss;

NOW, THEREFORE, the parties to the above-captioned actions, by and through their undersigned counsel, hereby stipulate and agree, subject to the Court’s approval, as follows:

1. The consolidated Actions are hereby consolidated under the caption *In re Tetraphase Pharmaceuticals, Inc. Shareholder Litigation*, Civ. No. 1:16-cv-10133-LTS;
2. Lead Plaintiffs shall file a consolidated amended complaint on or before July 25, 2016;
3. Defendants shall move to dismiss, answer or otherwise respond to the consolidated amended complaint within 60 days after Lead Plaintiffs file such complaint with the Court;
4. Lead Plaintiffs shall file any opposition papers to any motion to dismiss filed by Defendants within 60 days after Defendants’ file their motion to dismiss;
5. Defendants shall file any reply papers within 30 days after Lead Plaintiffs file their opposition papers to Defendants’ motion to dismiss.

Dated: June 3, 2016

Respectfully Submitted,

/s/ Shannon L. Hopkins

Shannon L. Hopkins (BBO # 657485)

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/s/ Joseph P. Guglielmo

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Counsel for Lead Plaintiffs

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Sarah L. Murphy, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on this 3rd day of June, 2016.

/s/ Sarah L. Murphy
Sarah L. Murphy

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOSEPH HARRINGTON, individually and on
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V.

TETRAPHASE PHARMACEUTICALS INC.,
GUY MACDONALD, JOHN CRAIG
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[PROPOSED] SCHEDULING ORDER

THIS CAUSE came before the Court upon the parties' Joint Stipulation and Proposed Scheduling Order and upon due consideration, and for good cause shown,

IT IS HEREBY ORDERED as follows:

1. The consolidated Actions are hereby consolidated under the caption *In re Tetraphase Pharmaceuticals, Inc. Shareholder Litigation*, Civ. No. 1:16-cv-10133-LTS;
2. Lead Plaintiffs shall file a consolidated amended complaint on or before July 25, 2016;
3. Defendants shall move to dismiss, answer or otherwise respond to the consolidated amended complaint within 60 days after Lead Plaintiffs file such complaint with the Court;
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Dated: _____, 2016

Hon. Leo T. Sorokin
United States District Judge